

1 ERIC GRANT
2 United States Attorney
3 COLLEEN M. KENNEDY
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700
8 Facsimile: (916) 554-2900

9
10 Attorneys for the United States

11
12
13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

Case No. 2:25-cv-00091-DAD-JDP

17 Plaintiff,

18
19 STIPULATED REQUEST AND
20 [PROPOSED] ORDER TO EXTEND
21 DEADLINE TO FINALIZE SETTLEMENT
22 AGREEMENT

23 v.

24 JOAN RUBINGER,

25 Defendant.

1 Plaintiff the United States and Defendant Joan Rubinger (collectively, "the Parties"), by
2 and through their respective undersigned counsel, enter into the following stipulation to continue
3 the deadline set by the Court for the Parties to finalize the "long form settlement agreement"
4 memorializing the Parties' resolution of this matter.

5 WHEREAS, at the conclusion of the settlement conference held on November 4, 2025,
6 with Magistrate Judge Jeremy D. Peterson, the Parties reached an agreement in principle as to a
7 proposed resolution of this case, subject to final approval by the necessary officials within the
8 U.S. Department of Justice;

9 WHEREAS, the Court ordered the parties to finalize their settlement agreement within 30
10 days of that date, or by December 4, 2025 (ECF 19);

11 WHEREAS, despite the Parties' diligent efforts to finalize the agreement, the Parties will
12 be unable to do so by December 4, 2025; and

13 WHEREAS, the Parties believe they will be able to finalize their settlement agreement,
14 including obtaining final approval by the Department of Justice, by January 5, 2026;

15 Accordingly, the Parties respectfully request that the Court's deadline to finalize the
16 settlement agreement in this matter be continued by approximately one month, to January 5,
17 2026. A proposed Order is provided for the Court's convenience.

18 Respectfully submitted,

19 Dated: December 2, 2025

ERIC GRANT
United States Attorney

22 */s/ Colleen M. Kennedy*

23

COLLEEN M. KENNEDY
Assistant United States Attorney

24 *Attorneys for the United States*

1
2 Dated: December 2, 2025

BYRNE & NIXON LLP

3 /s/ Jennifer L. Derwin
4 MARK A. BYRNE
5 JENNIFER L. DERWIN

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
Counsel for Defendant Joan Rubinger

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties and good cause appearing, the deadline for the Parties to finalize the long form settlement agreement memorializing the Parties' resolution of this matter is hereby continued to January 5, 2026.

IT IS SO ORDERED.

DATED: December 2, 2025



JEREMY D. PETERSON
United States Magistrate Judge